

435.36
06/29/98
Rev. 02

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer	
1. Person Initiating Report: D. E. Raunig	Phone: 526-5501
Contractor WAG Manager: C. S. Evans <i>Dec 3/8/99 CPP</i>	Phone: 526-1493
2. Site Title: Boxed Soil/ ECA-97 99 <i>CPP 9/30/98</i>	
<p>3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.</p> <p><i>Dec 3/8/99 CPP 99 TWS 9/30/98</i></p> <p>The purpose in submission of the ECA-07, new site identification form, is to acknowledge the existence of 59 boxes of contaminated soil. By developing the new site, (ECA-07), the human health and environmental risks associated with the contaminants in the soil can be assessed. <i>Dec 3/8/99 CPP 99 TWS 9/30/98</i></p> <p>The boxed soils are staged in the CPP-1617 Waste Storage Facility. The facility is on the south end of INTEC and on the east side of Birch Street (see attachment 1 for location). The fifty nine (59), storage boxes are constructed of wood and have dimensions of 2ft X 4ft X 8ft. The boxes were generated during the ICPP Tank Farm upgrade project and the CPP-604 Egress Tunnel project. Several factors have contributed to the existence of contamination in the boxed soil. Factors include the following list.</p> <ol style="list-style-type: none"> 1. Accidental releases and leaks through ICPP process piping beneath CPP-604 and the Tank Farm. 2. Cross contamination through Tank Farm operational and maintenance excavations. 3. Fallout from years of operating the ICPP main stack. 4. Migration of contamination from ICPP Tank Farm valve boxes and vault sumps, via vent tubes prior to 1970. 5. Wind blown contamination from releases outside the Tank Farm. <p>The boxed soils were generated and managed as low level rad in 1993, 94, and 95. However, the Tank Farm and CPP-604 facilities have listed waste codes associated with each area. Therefore, the 59 boxes of soil may contain radioactive and potentially listed constituents and should be managed as such, (see attachment 2, potential waste codes). The applicable codes are subject to change per ongoing regulatory negotiation. <i>TWS 9/30/98</i></p>	

Part B – To Be Completed By Contractor WAG Manager	
4. Recommendation:	
<input checked="" type="checkbox"/> This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO. WAG: 3 Operable Unit: 3-14	
<input type="checkbox"/> This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.	

NEW SITE IDENTIFICATION

5. Basis for the recommendation:

The basis for including the Tank Farm shoring material boxes as a new FFA/CO, CERCLA site includes the following logic.

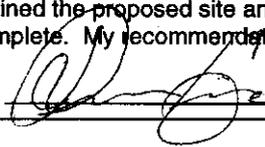
^{99 TWS 9/30/98}
The ECA-07 storage boxes contain soil from the INTEC Tank Farm and CPP-604 areas. The boxes are believed to represent a potential threat to human health and the environment. The areas from which the boxes were generated is known to contain radioactive and potentially listed contaminants. The contaminants are believed to have originated from past releases to the soil column from Tank Farm and CPP-604 process piping.

The Tank Farm and CPP-604 boxed soils are not currently managed under the RCRA or CERCLA programs. The source of the contamination in the boxed soil is believed to have originated from release sites that have since been included in the CERCLA program. Therefore, the LMITCO Environmental Restoration Soils Department recommends that the Tank Farm and CPP-604 soil boxes staged in CPP-1617 should be included as a new site to the FFA/CO.

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believes the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: C. S. Evans

Signature: 

Date: 9/17/98

NEW SITE IDENTIFICATION

Part C - To Be Completed By DOE WAG Manager

7. DOE WAG Manager Concurrence:

WAG Operable Unit:

Concur with recommendation.

Do not concur with the recommendation. Explanation follows:

Name: T. W. Jenkins

Signature: Talley in Office

Date: 9/30/98

Part D - To Be Completed By The INEEL FFA/CO Responsible Program Managers (RPM's)

8. FFA/CO RPM's Concurrence:

For DOE-ID

Name: Kathleen Hain

Signature: Kathleen E Hain

Date: 9/30/98

Concur

Do not concur. Explanation follows:

While the soils were dug-up through construction, the contamination resulted from past operations and falls with FFA/CO responsibility.

For EPA Region X

Name: Wayne Pierre

Signature: Wayne Pierre

Date: 12/15/98

Concur

Do not concur. Explanation follows:

For State of Idaho

Name: Dean Nygard

Signature: Dean Nygard

Date: 11/3/98

Concur

Do not concur. Explanation follows:

I concur with the inclusion of the 59 boxes of contaminated soil under the FFA/CO. These soils are to be addressed as part of the 3-13 ROD, not 3-14 as recommended by the DOE-WAG manager.

From: Talley W Jenkins@Exchange on 03/08/99 11:13 AM

To: Debra L Ellis/DLG/LMITCO/INEEL/US@INEL, Paul W Arpke/AWP/LMITCO/INEEL/US@INEL
cc: Robert E James/JAMERE/LMITCO/INEEL/US@INEL, Carol S Evans/EVANCS/LMITCO/INEEL/US@INEL,
Talley W Jenkins@Exchange, Kathleen E Hain@Exchange

Subject: New Site Identification forms for WAG 3

The New Site Identification (NSI) forms for site CPP-96, -97, -98, and -99 are to be added to operable unit (OU) 3-13. Site CPP-96 is part of Group 1 and sites CPP-97, -98, and -99 are part of Group 3. Following signature of the OU 3-13 Record of Decision, site CPP-96 along with the rest of Group 1 will be OU 3-14 work scope for a final decision.

If you have questions, let me know.

Thanks,

Talley